



LAW FIRM OF  
**OMAR T. MOHAMMEDI, LLC**

OMAR T. MOHAMMEDI, ESQ.  
DIRECT DIAL: (212) 725-3846 x102  
EMAIL: OMOHAMMEDI@OTMLAW.COM

USDC SDNY  
**DOCUMENT**  
**ELECTRONICALLY FILED**  
**DOC #:** \_\_\_\_\_  
**DATE FILED:** 09/28/2017

September 28, 2017

**VIA ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)**

Dear Judge Netburn:

On behalf of the World Assembly of Muslim Youth (“WAMY”) we write to respectfully request an additional sixty (60) days to complete WAMY’s document production. We also request a brief telephone conference with your Honor and Plaintiffs to discuss this matter.

On March 23, 2017, Your Honor set September 29, 2017, as the deadline for WAMY’s document production. Following this March 23<sup>rd</sup> Order, WAMY has produced 363,002 pages to Plaintiffs on a rolling basis.<sup>1</sup> To date WAMY has produced 1,055,362 pages in total. WAMY has completed its search for discovery documents. The vast majority of them have been produced to Plaintiff. However, due to the volume of the documents and the fact that they are almost all in Arabic, we are unable to complete our production by September 29, 2017.

We also lost one Arabic interpreter who was very sick and had to stop working. We are working diligently to get this production completed. We wrote a letter to Plaintiffs and asked them if they had any position on this. We also informed them that we would be seeking a conference with your Honor to discuss this matter. (See Letter to Sean Carter dated September 25, 2017, annexed herein as Exhibit 1). Plaintiffs have not yet responded to WAMY’s request.

<sup>1</sup> On May 2, 2017 WAMY produced 27,785 pages;  
On June 19, 2017 WAMY produced 73,183 pages;  
On July 20, 2017 WAMY produced 124,612 pages;  
On August 23, 2017 WAMY produced 79,953 pages;  
On September 25, 2017 WAMY produced 57,469 pages.

LAW FIRM OF  
**OMAR T. MOHAMMEDI, LLC**

We therefore respectfully ask that the Court schedule a telephone conference to discuss this request with counsel at its earliest convenience. Thank you, Your Honor for your time and consideration of this request.

Respectfully Submitted,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/Fredrick Goetz

Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)

A telephone conference is scheduled for 4:00 p.m. on October 5, 2017, to discuss an extension to the deadline for Defendant World Assembly of Muslim Youth's document production. At that time, the parties should jointly call Chambers, at (212) 805-0286, with all relevant individuals on the line. If this date is unavailable for any party, they must contact Courtroom Deputy Joseph Mendieta immediately at (212) 805-0286. The Plaintiffs' Executive Committees may file a response to this letter by October 3, 2017.

**SO ORDERED.**

  
\_\_\_\_\_  
SARAH NETBURN  
United States Magistrate Judge

September 28, 2017  
New York, New York